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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Implementation of the Pay)
Telephone Reclassification and)
Compensation Provisions of the)
Telecommunications Act of 1996)

CC Docket No. 96-128

CC Docket No. 91-35

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Federal Communications Commission
Office of Secretary

AT&T'S COMMENTS ON U S WEST'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN

Pursuant to the Commission's Public Notice released January 8, 1997,¹ AT&T Corp. ("AT&T") hereby submits these comments on the U S WEST, Inc.'s ("U S WEST's") comparably efficient interconnection ("CEI") plan for payphone service providers.²

In its CEI plan, U S WEST states generally that it will purchase and use the same tariffed services that are available to other providers of payphone services. U S WEST further states that it will satisfy the Commission's additional requirement that the BOCs meet the nonstructural

¹ Pleading Cycle Established for Comments on Comparably Efficient Interconnection Plans for Payphone Service Providers, Public Notice, CC Docket No. 96-128, DA 97-31, released January 8, 1997.

² The Commission required the Bell Operating Companies ("BOCs") to file CEI plans in Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, FCC 96-388, released September 20, 1996 ("Payphone Order"); and Order on Reconsideration, FCC 96-349, released November 8, 1996 ("Reconsideration Order").

safeguards standards adopted for their enhanced service offerings in Computer Inquiry III.³ In these comments, AT&T seeks clarification of certain aspects of U S WEST's service that are not specifically addressed in the CEI plan.

First, U S WEST should make clear that its Public Access Line ("PAL") service will be made available on a non-discriminatory basis to all payphone service providers. This service provides certain functions, such as coin signalling and coin rating, to customer provided payphones that are commonly referred to as "dumb sets." Despite the statement in U S WEST's CEI plan (p. 5) that tariffs that are used with "U S WEST's payphone services will be filed in U S WEST's 14 states," those tariffs that are already filed state only that PAL service is "subject to the availability of existing CO facilities."⁴ At a minimum, U S WEST should be required to amend its CEI plan to clarify that the service will be available to non-U S WEST payphone service providers at every central office where such service is provided to U S WEST's payphone service affiliate, and to reflect such conditions of availability in its tariffs.

³ See Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer Inquiry III), Report and Order, 104 F.C.C.2d 958 (1986).

⁴ See, e.g., U S WEST's Exchange and Network Service Tariff, COLO. P.U.C. No. 15, Section 5.5.7.A.1, Original Sheet 164, effective August 18, 1995, attached as Attachment B to U S WEST's CEI plan.

U S WEST's CEI plan also fails to address the Commission's requirement that LECs ensure transmission of codes that enable interexchange carriers to track payphone calls. Pursuant to the Reconsideration Order (para. 94), U S WEST is required to offer services "that provide a discrete code to identify payphones that are maintained by non-LEC providers." Accordingly, U S WEST should provide, in its CEI plan, detail on the types of codes it will use to identify U S WEST payphones and the payphones of non-affiliated providers. Whatever codes U S WEST chooses to use, those codes should be transmitted for both Smart PAL service and Basic PAL service, in order to prevent discrimination between users of the different services.⁵

Furthermore, U S WEST's CEI plan does not address U S WEST's proposed treatment of uncollectibles due to fraud. To the extent that U S WEST establishes a policy of foregoing uncollectibles due to fraud for its payphone service affiliates, the same treatment must be accorded to non-affiliates, regardless of whether such practice appears

⁵ The Southwestern Bell Telephone Company ("SWBT") has addressed this issue in its CEI plan by stating that "[a]s required by paragraph 64 of the Reconsideration Order, at the time per-call compensation becomes effective, [SWBT's Customer Owned Pay Telephone Service] lines will transmit coding digits which will specifically identify them as payphone lines." See SWBT CEI plan, Exhibit B, page 1 of 4, filed December 30, 1996. U S WEST similarly should explicitly state its intention to provide the required screening information.

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in U S WEST's tariffs. In order to ensure such nondiscriminatory treatment, U S WEST should be required to modify its CEI plan to address this issue directly.

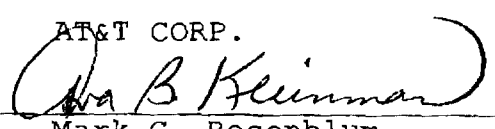
Finally, U S WEST's CEI plan does not address how U S WEST will ensure that the primary interexchange carrier ("PIC") selection process for payphones will be performed in a non-discriminatory manner. As U S WEST becomes both a provider of interexchange services and the administrator of the PIC selection process, it is imperative that its CEI plan describe adequate and appropriate safeguards to ensure fairness in that process.

For the reasons stated above, before U S WEST's CEI plan is approved, U S WEST should clarify its plan consistent with AT&T's comments.

Respectfully submitted,

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February 7, 1997

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 7th day of February, 1997, a copy of the foregoing "AT&T's Comments on U S WEST's Comparably Efficient Interconnection Plan" was mailed by U.S. first class mail, postage prepaid, to the parties listed below.

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